

**UNITED STATES BANKRUPTCY COURT
FOR SOUTHERN DISTRICT OF NEW YORK**

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| _____) | |
| IN RE:) | CHAPTER 11 |
| _____) | |
| Lehman Brothers Holdings, Inc., et al.,) | CASE NO.: 08-13555 (JMP) |
| Debtor) | JOINTLY ADMINISTERED |
| _____) | |

**NOTICE OF HEARING ON CREDITOR, PLYMOUTH PARK TAX SERVICES,
LLC D/B/A XSPAND, MOTION FOR RELIEF FROM STAY
(DOCKET ENTRY #30017)**

PLEASE TAKE NOTICE that on August 14, 2012, Plymouth Park Tax Services, LLC d/b/a Xspand ("Plymouth"), filed a motion for relief from the automatic stay imposed by this proceeding (Docket Entry #30017), and that a hearing to consider Plymouth's motion for relief from stay will be held before the Honorable James M. Peck, United States Bankruptcy Judge, in Courtroom 601 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004 on **May 15, 2013 at 10:00 a.m. (Eastern Time)**, or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that any responses to Plymouth's Motion must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182

(which can be found at www.nysb.uscourts.gov), and served in accordance with General Order M-399, and on (i) the chambers of the Honorable James M. Peck, One Bowling Green, New York, New York 10004, Courtroom 601; (ii) attorneys for the Debtors, Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Robert J. Lemons, Esq.) and Reilly Pozner LLP, 1900 16th Street, Suite 1700, Denver, Colorado 80202 (Attn: Michael Rollin, Esq.); (iii) the Office of the United States Trustee for Region 2, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Tracy Hope Davis, Esq., Elisabetta G. Gasparini, Esq. and Andrea B. Schwartz, Esq.); and (iv) attorneys for the official committee of unsecured creditors appointed in these cases, Milbank, Tweed, Hadley & McCloy LLP, 1 Chase Manhattan Plaza, New York, New York 10005 (Attn: Dennis F. Dunne, Esq., Dennis O'Donnell, Esq., and Evan Fleck, Esq.); so as to be so filed and received by no later than **May 1, 2013 at 4:00 p.m. (Eastern Time)** (the "Response Deadline").

PLEASE TAKE FURTHER NOTICE that if no response is timely filed and served with respect to the Plymouth's Motion or any claim set forth thereon, Plymouth may, on or after the Response Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to Plymouth's Motion, which order may be entered with no further notice or opportunity to be heard offered to any party.

March 27, 2013 _____
Date

THE MOVANT

_____/s/_____
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